

January 10, 2002

Via Hand Delivery

Henry Ogden, Esq.
Acting Secretary
New Jersey Board of Public Utilities
Two Gateway Center
Newark, NJ 07102

**Re: In the Matter of the Consultative Report on the Application of
Verizon New Jersey Inc. for FCC Authorization to Provide In-Region,
InterLATA Service in New Jersey
Docket No. TO01090541**

Dear Acting Secretary Ogden:

In the Board's letter dated January 9, 2002, in the above-referenced matter, the Board requested confirmation that the unbundled network element (UNE) rates specified in the Board's order of December 17, 2001 in Docket No. TO00060536, have been implemented. As an officer of Verizon New Jersey Inc., I am able to make the following attestation, on behalf of the corporation.

Verizon NJ is working on an expedited basis to implement the system changes required for the new UNE rates. The necessary changes to the billing systems will be completed on January 20, 2002. As certified in Verizon NJ's electronic notification to CLECs (on December 21, 2001), the new UNE rates became effective on December 17, 2001. Due to the expedited timeline that makes the rates effective before all system changes can be completed, implementation and handling of these billing changes will vary based on the rate classification, *i.e.*, Monthly recurring rate, Non-recurring rate, or Usage, and whether the product is billed using CRIS or CABS. The attached template provides a summary of the transitional billing treatment for each rate classification in each billing system.

Billing is a cycle-driven process, and certain of the charge changes, although effective as of December 17, 2001, will likely not be reflected until the first or second bill after the software implementation is completed. For that reason, Verizon New Jersey Inc. commits to provide the Board an actual copy of a CLEC bill that reflects an illustrative example of the new UNE rates for each rate type (Monthly recurring, Non-recurring, Usage, as appropriate in CRIS and CABS) within ten business days of its bills first

reflecting the new UNE rates and the credits utilized to reflect an effective date of December 17, 2001.

Broad changes to the billing rate structure require extensive software reprogramming, and Verizon New Jersey Inc. recognizes that, despite our best efforts, errors or omissions in the updating process are possible. Additionally, Verizon New Jersey Inc. notes that certain discrete categories of charge changes, involving end-users or services that are terminated or disconnected between the effective date of December 17, 2001, and the implementation date of the subject changes, may be especially difficult to capture in the updating process. Verizon New Jersey Inc., therefore, also commits to work cooperatively with such competitive local exchange carriers as may have questions or concerns regarding line-item entries on their bills and to report to the Board regarding both the extent of such questions and concerns, and the remedies effected to resolve same.

We trust this correspondence is responsive to the Board's condition as expressed in its letter of January 9, 2002, but please feel free to contact the undersigned should further information be necessary.

Respectfully submitted,

Bruce D. Cohen

BDC:dmp

cc: Service List (via e-mail & regular mail)